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*Attorneys for Plaintiffs and The Class*

**IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

RAYMOND SKELTON,	)	
	)	Civil Action No. 1:19-cv-18597-RMB-
	)	SAK
	)	
<i>Plaintiff,</i>	)	
v.	)	
	)	<b><i>DOCUMENT FILED</i></b>
	)	<b><i>ELECTRONICALLY</i></b>
VICTORIA L. KUHN, et al.,	)	
	)	
	)	
<i>Defendants.</i>	)	

**PLAINTIFF'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO SERVE DEFENDANTS**

Plaintiff, Raymond Skelton, by and through undersigned counsel, hereby respectfully moves the Court for an extension of the current deadline for service of process of the Second Amended Class Action Complaint and the filing of affidavits of service applicable under Rule 4 of the Federal Rules of Civil Procedure. In support thereof, Plaintiff states the following:

1. Plaintiff filed their Second Amended Class Action Complaint on December 15, 2022. (ECF 44).

2. On December 21, 2022, Plaintiff served Rule 4 Notices of Lawsuit and Requests for Waiver of the Service of Summons to all Defendants “care of” Daniel Shehata, the Office of the Attorney General.

3. On December 23, 2022 Mr. Shehata responded stating the only Defendant he was currently able to accept service for was Mr. Hicks, and he would follow-up regarding if their office gets permission to accept service on behalf of the remainder of the Defendants.

4. On January 17, 2023, February 6, 2023 and February 27, 2023, Plaintiff’s counsel reached out to Mr. Shehata again to follow-up on if his office had been authorized to accept service on behalf of the remaining named Defendants. Each time, Mr. Shehata represented that his office was working on contacting the Defendants, but informed Plaintiff’s counsel that they still did not have authority to accept service.

5. On February 27, 2023, Mr. Shehata advised Plaintiff’s counsel that his office had made contact with, and intends to represent, five (5) of the Defendants (aside from Mr. Hicks). Upon learning this information, Plaintiff’s counsel reissued Rule 4 Notices and Waivers to the Defendants indicated and sent them to Mr. Shehata to execute on their behalf.

6. As of March 7, 2023, Plaintiff's counsel is still waiting to receive any executed Rule 4 Waivers from Defendants.

7. Mr. Shehata has advised Plaintiff's counsel that his office is awaiting conflicts checks to clear prior to executing the Rule 4 Waivers.

8. On February 27, 2023 Plaintiff filed Request for Summons to be Issued as to seventeen (17) Defendants.

9. Plaintiff has made extensive good faith efforts to communicate with other counsel in order to timely and cost effectively serve the many Defendants in this case.

10. Due to the large number of Defendants, it has been difficult for both Plaintiff's counsel and the Attorney General's Office to locate and make contact with all Defendants.

11. The current deadline to serve Defendants with the Second Amended Complaint is March 15, 2023. Plaintiff is requesting additional time, to and including May 1, 2023, to locate and serve the Defendants.

12. The undersigned has conferred with counsel for Defendant Hicks, Mr. Shehata, and they do not oppose this request.

13. This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

Dated: March 8, 2023

Respectfully Submitted,

/s/Keith Altman

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### **CERTIFICATE OF SERVICE**

I hereby certify that on March 8, 2023, I served the foregoing document upon all parties by filing this document on this court's CM/ECF electronic filing system which will send a true copy to all counsel of record.

/s/ Solomon M. Radner

*Attorney for Plaintiffs and the Class*